

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

TONJIA WINGO,

Plaintiff,

V.

RITE OF PASSAGE DePaul  
ACADEEMY,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

CASE NO. 3:19-CV-00351-JD-MGC

2019 OCT -7 AM 9:13  
U.S. DISTRICT COURT CLERK  
NORTHERN DISTRICT  
OF INDIANA

FILED

PLAINTIFF'S FIRST SET OF INTERROGATORIES

Comes now the Plaintiff proceeding as a Pro Se' Litigant... as a necessity in the above styled\_numbered case...pursuant under Rule 33 of the Federal Rules of Civil Procedure, hereby propound his First Set of Interrogatories to Defendant Ike Shipmen, to be answered in accordance with the Federal Rule of Civil Procedure, separately and fully, in writing, under oath, and within (30) days of service hereof in the Plaintiff's address 24581 Nash Avenue, South Bend, IN 46619.

INSTRUCTIONS

You must produce all information that is either in your possession or control or in the possession or control of your attorneys, agents,

investigators, employees, agents, or other representatives of you or your attorneys.....you remain under duty to objectively and reasonably provide with your responses of these Interrogatories the where a bouts and identity, plus location of persons having knowledge of a favored discoverable matter that mat be a part of your witness list....any evasive answers are a failure if not completely written separately and fully.

### DEFENITIONS

As defined and pursuant to Federal Rule of Civil Procedure Rule 34

All writings wherever they are located be it in the form of original or copy form shall be shall be forwarded to Plaintiff...including but not limited to the following correspondence summaries of conversation, inter-office memoranda, reports, comments, discussions, telephone conversations, forms, documents, drafts, copies, notes, records, and video recordings are subject to be visually and physically examined by Plaintiff.

If you need any clarification as to the information being sought, immediately contact Pro Se' Litigant for further clarity.

INTERROGATORIES

INTERROGATORY NO. 1: State your full name, date of birth, Social Security number, also the name you customarily use as well as any aliases.

**ANSWER:**

INTERROGATORY NO. 2: Please state the name, address and telephone number of your place of employment at the present time and also list your employers in chronological order, including dates of employment for the past fifteen (15) years preceding the year in question, your title/position with each company and the reason you left the previous companies?

**ANSWER:**

INTERROGATORY NO. 3: Please list your address for the past ten (10) years in chronological order, including a list of landlords names and addresses.

**ANSWER:**

INTERROGATORY NO. 4: Where are you currently employed? In your

answer, please list the name and address of your employer, your starting date, job title and current rate of pay.

**ANSWER:**

INTERROGATORY NO. 5: Please list in chronological order the steps you took as to the investigation, the position held with the company/ your title you were in as to the process in the proceedings, and how you came into being involved in the case at hand?

**ANSWER:**

INTERROGATORY NO. 6: Please list in chronological order the dates, and times you were contacted, who contacted you, and why they contacted you, and word for word (verbatim) the information they expressed to you, and what you did with said information with the case at hand?

**ANSWER:**

INTERROGATORY NO. 7: Please list in chronological order all of the Documents you signed, times you signed them and why you signed them, along with the dates you signed them. Name the policy and procedures that was used to take care of the matter at hand. List the steps you took to investigate the matter at hand . Also list the chain of command in order, where you fall in that chain of command, the proper protocol that must be taken in issue like this, and explain what was the inception of these proceedings....provide along with your answer dates and times that coincide with the actions taken by you.

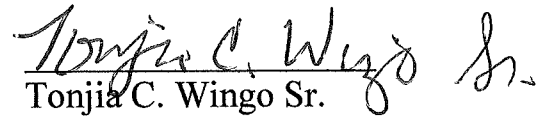
**ANSWER:**

The undersigned submits under the penalties for perjury that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

---

Michelle Ruth

Respectfully Submitted,  
Tonjia C. Wingo Sr.  
24581 Nash Ave.  
South Bend, IN 46619

  
Tonjia C. Wingo Sr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon Vincent P. Antaki #22260-15 Remingger CO. L.P.A. College Park Plaza 8909 Purdue Road, Ste. 200 Indianapolis, IN 46268 by depositing the same in the United States mail, certified mail this 7<sup>th</sup> day of October 2019.

  
Tonjia C. Wingo Sr.